

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

385777 937380

REPLY TO THE ATTENTION OF

VIA FAX AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

November 13, 2009



Non-Responsive:

This letter is in response to your inquiries about the status of cleanup activities at Non-Responsive in Delta, Ohio, near the Bunting Bearings facility. As you know, the U.S. Environmental Protection Agency (EPA) in conjunction with Ohio EPA, responded to contaminated soil at the facility, and on residential properties adjacent to or near the facility, including Non-Responsive In March of 1998, EPA entered into an administrative order by consent (AOC) with Eagle-Picher Industries, the former owner of the facility, and the Bunting Bearings Corporation. The AOC required Eagle-Picher and Bunting Bearings to conduct sampling for specific contaminants such as copper, lead (Pb), and zinc, in order to determine the extent of contamination, to remove the contaminated soil to levels that are protective of human health and the environment, and to transport all contamination to a regulated facility for disposal.

The facility originally came to the attention of EPA through a site investigation report prepared by Ohio EPA dated September 22, 1995. Based upon the use of the facility as a foundry, the site investigation report focused on particular contaminants, especially metals such as lead (Pb). Likewise, the subsequent sampling that was conducted at the facility and on adjacent properties pursuant to the AOC, focused on specific contaminants. Of the contaminants tested for it was determined that lead (Pb) was the main contaminant in soil that had to be removed to protect human health and the environment. Based upon sampling results, and with EPA oversight, Eagle-Picher and Bunting Bearings began removing contaminated soil from the residential properties adjacent to and near the facility in the October of 1999. The cleanup is now complete and EPA is reviewing a Draft Removal Action Report dated August 25, 2009, prepared for Bunting Bearings, LLC, by Civil & Environmental Consultants, Inc.

I understand that of particular concern to you is whether the property at Non-Responsive has been cleaned up. The sampling that has been conducted as part of the ongoing cleanup effort focused on a particular set of contaminants associated with the facility, and did not test for every

possible type of contamination. The sampling at Non-Responsive was conducted to determine the amount of certain metals present in soils. The results were provided to the owner of Non-Responsive , by Eagle-Picher Industries as an attachment to a letter dated November 30, 1998.

The sample results indicated that lead (Pb) was the primary concern in the residential area surrounding the facility. In order to protect public health and the environment, EPA established a cleanup goal of 400 parts per million (ppm) for lead in this residential area including Non-Responsive. All identified soil containing more than 400 ppm for lead (Pb) has been removed from the residential area including such soil at Non-Responsive

The cleanup that was conducted under the AOC focused on getting rid of known contaminants in the soil that posed a risk to human health and the environment. Sample results from testing done after the removal of contaminated soil confirmed that the established cleanup levels under the AOC were achieved. It is possible, however, that other contaminants that were not tested for are present in the soil or groundwater beneath Non-Responsive. For this reason we can tell you that the cleanup and removal of the contaminants of concern addressed by the AOC were properly removed from Non-Responsive. We cannot, however, tell you whether there is any other contamination at Non-Responsive.

I hope this answers your questions and helps to explain the history and current status of the cleanup efforts associated with the Bunting Bearing facility in Delta, Ohio.

Sincerely,

Craig/Melodia

Assistant Regional Counsel

cc: Archie Lunsey, Ohio EPA